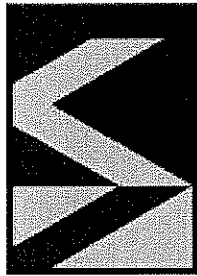


EXHIBIT B

From: [Stephen Stern](#)
To: [Tom Gagliardo](#); [Gregory Jordan](#)
Cc: [Shannon Hayden](#); [Brian Tollefson](#)
Subject: RE: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition
Date: Thursday, December 28, 2023 1:14:43 PM
Attachments: [image001.png](#)

It will be in Chicago (CST)



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Fairfax, Virginia 22030
(571) 450-8371

From: Tom Gagliardo <tgagliardo@gelawyer.com>
Sent: Thursday, December 28, 2023 1:14 PM
To: Stephen Stern <Stern@kaganstern.com>; Gregory Jordan <gjordan@jz-llc.com>
Cc: Shannon Hayden <hayden@kaganstern.com>; Brian Tollefson <brian@tollefsonip.com>
Subject: RE: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

Please specify time zone. I am available all day on the 17th but defer to Greg.

Thomas J. Gagliardo, Esq.
Of Counsel
Gilbert Employment Law PC
8403 Colesville Road, Suite 1000 | Silver Spring, MD 20910
telephone 301.608.0880 Ext. 825 | fax 301.608.0881
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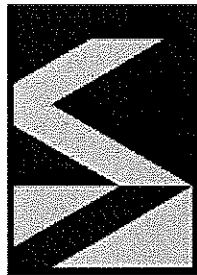
This message is not intended to support the promotion or marketing of any transaction.

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, December 28, 2023 1:04 PM
To: Gregory Jordan <gjordan@jz-llc.com>
Cc: Tom Gagliardo <tgagliardo@gelawyer.com>; Shannon Hayden <hayden@kaganstern.com>; Brian Tollefson <brian@tollefsonip.com>
Subject: RE: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

Let's go with January 17 (Wednesday). Start time likely will be 9:30, maybe 10:00. I will circle back on the start time along with the location after the start of the new year.

Also, as a reminder, please supplement your document production with additional communications to/from Dan and/or Michael White.

Stephen



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From: Gregory Jordan <gjordan@jz-llc.com>
Sent: Wednesday, December 27, 2023 3:39 PM
To: Stephen Stern <Stern@kaganstern.com>
Cc: Thomas J. Gagliardo <tgagliardo@gelawyer.com>; Shannon Hayden <hayden@kaganstern.com>; Brian Tollefson <brian@tollefsonip.com>
Subject: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

Stephen,

David and I are available Monday and Wednesday during the week of January 15.

Gregory J. Jordan
Licensed in Illinois and Indiana
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Jordan & Zito LLC

From: Stephen Stern <Stern@kaganstern.com>

Sent: Thursday, December 21, 2023 2:42 PM

To: Gregory Jordan <gjordan@jz-llc.com>

Cc: Thomas J. Gagliardo <tgagliardo@gelawyer.com>; Shannon Hayden <hayden@kaganstern.com>; Brian Tollefson <brian@tollefsonip.com>

Subject: RE: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

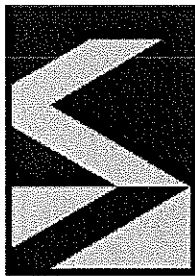
Greg:

My wife is having a medical procedure the first week in January, so that will not work and I am currently scheduled to be in Arizona on January 8.

Please provide dates the week of January 15, which also should avoid the need for any 11:00 start times and the possibility of going into the evening.

Also, please supplement the production of documents (which you are obligated to do) with any communications between David and Dan or Michael White, as well as with any communications between you and Dan or Michael White.

Stephen



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From: Gregory Jordan <gjordan@jz-llc.com>

Sent: Thursday, December 21, 2023 12:14 PM

To: Stephen Stern <Stern@kaganstern.com>

Cc: Thomas J. Gagliardo <tgagliardo@gelawyer.com>; Shannon Hayden <hayden@kaganstern.com>; Brian Tollefson <brian@tollefsonip.com>

Subject: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

Stephen,

The 11:00 am start time takes into account court hearing time in the morning. We can start earlier on the 4th, the 5th, or the 8th. No other dates are available during the week of the 8th.

Gregory J. Jordan

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Jordan & Zito LLC

From: Stephen Stern <Stern@kaganstern.com>

Sent: Thursday, December 21, 2023 11:11 AM

To: Gregory Jordan <gjordan@jz-llc.com>

Cc: Thomas J. Gagliardo <tgagliardo@gelawyer.com>; Shannon Hayden <hayden@kaganstern.com>; Brian Tollefson <brian@tollefsonip.com>

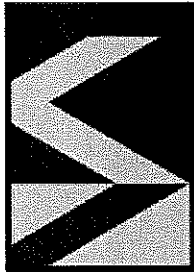
Subject: RE: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

Greg:

I am not sure why the late start time of 11:00. In the event that we need a full day, I would think that everyone would prefer not to be there into the evening. Plus, starting at 11:00 could limit the days the deposition can be conducted. I would prefer that we start at either 9:30 or 10:00 am CST.

As for the dates, can you clarify about January 8 – is it only that day that week or is it the entire week of January 8?

Stephen



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From: Gregory Jordan <gjordan@jz-llc.com>
Sent: Tuesday, December 19, 2023 1:58 PM
To: Stephen Stern <Stern@kaganstern.com>
Cc: Thomas J. Gagliardo <tgagliardo@gelawyer.com>; Shannon Hayden <hayden@kaganstern.com>
Subject: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

Stephen,

If you want an in-person deposition, we can schedule the deposition during the first week of January or on January 8 starting at 11:00 am (CST) on each day. Let me know which date works best for you.

Please make arrangements for Tom Gagliardo to participate via Zoom, since he will not be able to travel for the deposition.

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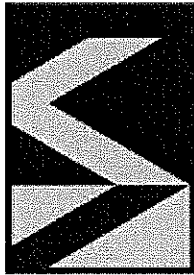
Jordan & Zito LLC

From: Stephen Stern <Stern@kaganstern.com>
Sent: Monday, December 18, 2023 10:00 AM
To: Gregory Jordan <gjordan@jz-llc.com>
Cc: Thomas J. Gagliardo <tgagliardo@gelawyer.com>; Shannon Hayden <hayden@kaganstern.com>
Subject: RE: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

Greg:

I am following up on scheduling David's deposition. It is now almost one week after you said you were returning from Florida and planning to speak with David. With it being so close to Christmas and New Year's now, please send multiple dates in January when David will be available for his deposition.

Stephen



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From: Gregory Jordan <gjordan@jz-llc.com>
Sent: Thursday, December 7, 2023 11:40 AM
To: Stephen Stern <stern@kaganstern.com>
Cc: Thomas J. Gagliardo <tgagliardo@gelawyer.com>; Shannon Hayden <hayden@kaganstern.com>
Subject: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

I will be in Florida until next Wednesday afternoon. I will meet with David on my return and get back to you.

Gregory J. Jordan
Licensed in Illinois and Indiana

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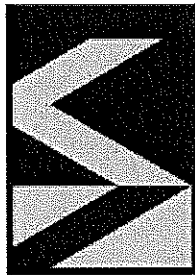
Jordan & Zito LLC

From: Stephen Stern <Stern@kaganstern.com>
Date: Thursday, December 7, 2023 at 11:16 AM
To: Gregory Jordan <gjordan@jz-llc.com>
Cc: Thomas J. Gagliardo <tgagliardo@gelawyer.com>, Shannon Hayden
<hayden@kaganstern.com>
Subject: Boshea v. Compass Marketing, Inc. - David Boshea's Deposition

Greg:

I assume you have seen the court's order by now granting Compass Marketing the opportunity to depose Mr. Boshea. Please let us know some dates when he will be available for his deposition in Chicago.

Thank you,
Stephen



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